

REMARKS

Claims 1-6 were examined and reported in the Office Action. Claims 1-6 are rejected. Claim 1 is amended. Claims 1-6 remain.

Applicant requests reconsideration of the application in view of the following remarks.

I. 35 U.S.C. § 102(b)

It is asserted in the Office Action that claims 1-3 and 6 are rejected in the Office Action under 35 U.S.C. § 102(b), as being anticipated by U.S. Patent No. 6,496,172, issued to Hirakata ("Hirakata "). Applicant respectfully traverses the aforementioned rejection for the following reasons.

According to MPEP 2131,

[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.' (Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)). 'The identical invention must be shown in as complete detail as is contained in the ... claim.' (Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989)). The elements must be arranged as required by the claim, but this is not an ipsissimis verbis test, i.e., identity of terminology is not required. (In re Bond, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990)).

Applicant's amended claim 1 contains the limitations of

[a] method for driving an LCD, comprising providing an LCD with a plurality of column lines (C), a plurality of scan lines (M), and a plurality of pixels and by driving the LCD by a multiple pixel inversion technique comprising: applying signals of a same polarity to a portion of an $n \times m$ pixel matrix where (n) is an integer from two to a number of scan lines and (m) is an integer from two to C - 1 number of column lines to provide a reduced total fringe field effect to maintain contrast and minimized flickering display.

Applicant's claimed invention includes a method for driving a LCD by signals of the same polarities in a portion of adjacent columns, rows or pixels. The driving method is illustrated in Applicant's Figures 16 to 18. With the multiple pixel inversion method and by applying signals of the same polarity to only a portion of adjacent elements selected from the group column, row and pixel, flickering in the fringe field effect observed in LCD's is overcome.

Hirakata discloses a driving method for LCDs. Hirakata describes multiple inversions of columns or rows. (Hirakata, Figures 17a and 17b). Hirakata, however, does not teach, disclose or suggest "[a] multiple pixel inversion technique comprising: applying signals of a same polarity to a portion of an $n \times m$ pixel matrix where (n) is an integer from two to a number of scan lines and (m) is an integer from two to C - 1 number of column lines to provide a reduced total fringe field effect to maintain contrast and minimized flickering display."

Therefore, since Hirakata does not disclose, teach or suggest all of Applicant's amended claim 1 limitations, Applicant respectfully asserts that a *prima facie* rejection under 35 U.S.C. § 102(b) has not been adequately set forth relative to Hirakata. Thus, Applicant's amended claim 1 is not anticipated by Hirakata. Additionally, the claims that depend directly or indirectly on claim 1, namely claims 2 -3 and 6, are also not anticipated by Hirakata for the above same reason.

Accordingly, withdrawal of the 35 U.S.C. § 102(b), rejection for claims 1-3 and 6 is respectfully requested.

II. 35 U.S.C. § 103(a)

It is asserted in the Office Action that claims 4 and 5 are rejected in the Office Action under 35 U.S.C. § 103(a), as being unpatentable over Hirakata in view of U. S. Patent No. 6,295,043 issued to Hashimoto et al ("Hashimoto"). Applicant respectfully traverses the aforementioned rejection for the following reasons.

According to MPEP §2142

[t]o establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. (In re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991)).

Further, according to MPEP §2143.03, “[t]o establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. (In re Royka, 490 F.2d 981, 180 USPQ 580 (CCPA 1974).” “*All words in a claim must be considered in judging the patentability of that claim against the prior art.*” (In re Wilson, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970), *emphasis added.*)

Applicant's claims 4 and 5 are either directly or indirectly dependent on amended claim 1. Applicant has addressed HIRAKATA regarding amended claim 1 above in section I.

Hashimoto discloses a display driving technique where the polarity of the image signal is inverted every field and every arbitrary n frames. Hashimoto, however, does not teach, disclose or suggest “[a] multiple pixel inversion technique comprising: applying signals of a same polarity to a portion of an $n \times m$ pixel matrix where (n) is an integer from two to a number of scan lines and (m) is an integer from two to $C - 1$ number of column lines to provide a reduced total fringe field effect to maintain contrast and minimized flickering display.”

Therefore, even if HIRAKATA were combined with Hashimoto, the resulting invention would still not include all of Applicant's claimed limitations. Since neither HIRAKATA, Hashimoto, nor the combination of the two, teach, disclose or suggest all the limitations of Applicant's amended claim 1, as listed above, Applicant's amended claim 1 is not obvious over HIRAKATA in view of Hashimoto since a *prima facie* case of obviousness has not been met under MPEP §2142. Additionally, the claims that directly or indirectly depend from amended claim 1, namely

claims 4 and 5, would also not be obvious over Hirakata in view of Hashimoto for the same reason.

Accordingly, withdrawal of the 35 U.S.C. § 103(a), rejection for claims 4 and 5 is respectfully requested.

CONCLUSION

In view of the foregoing, it is believed that all claims now pending, namely 1-6, patentably define the subject invention over the prior art of record and are in condition for allowance and such action is earnestly solicited at the earliest possible date.

If necessary, the Commissioner is hereby authorized in this, concurrent and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2666 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17, particularly extension of time fees.

PETITION FOR EXTENSION OF TIME

Per 37 C.F.R. 1.136(a) and in connection with the Office Action mailed on November 29, 2005. Applicant respectfully petitions the Commissioner for a two (2) month extension of time, extending the period for response to April 28, 2006. The Commissioner is hereby authorized to charge payment to Deposit Account No. 02-2666 in the amount of \$450.00 to cover the petition filing fee for a 37 C.F.R. 1.17(a)(2) large entity. A duplicate copy of the fee transmittal is enclosed.

Respectfully submitted,

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Dated: April 27, 2006

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CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail with sufficient postage in an envelope addressed to: Mail Stop RCE, Commissioner for Patents, P. O. Box 1450, Alexandria, Virginia 22313-1450 on April 27, 2006.


Jean Svoboda